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Counsel for Plaintiff Epic Games, Inc. in Epic Games, Inc. v. Google LLC et al.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al., Case No.
3:20-cv-05671-JD

In re Google Play Consumer Antitrust Litigation,
Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF YONATAN EVEN IN
SUPPORT OF EPIC AND THE MATCH
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Judge: Honorable James Donato

1 I, Yonatan Even, declare as follows:

2 1. I am a Partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc. (“Epic”)
 3 in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration in support of Epic’s Administrative Motion to File Under Seal.
 5 I have personal, first-hand knowledge of the facts set forth in this Declaration. If called as a witness, I
 6 could and would competently testify to these facts under oath.

7 3. The below table identifies the portion of Exhibit 1 to the Declaration of Justin R.
 8 Raphael in Support of Defendants’ Opposition to Plaintiffs’ Motion *in Limine* No. 2 (“Raphael
 9 Declaration”), (MDL Dkt. No. 637), that Epic seeks to seal:

Document and Location of Designated Information Name	Epic’s Bases for Sealing
Exhibit 1 to the Raphael Declaration in Support of Google’s Opposition to Plaintiffs’ <i>Motion in Limine</i> No. 2.	
Page ending -129 (the content of the “From:” line, containing an email address; the entire line, containing two names, that comes after the line beginning “Many thanks”; the name between “Hi” and “Thank you”; the name following “Hi”, following the line beginning “November 13, 2019”)	The document sought to be redacted contains non-party personally identifiable information, including the name of an Epic customer, the name of that customer’s minor son, and the Epic customer’s email address. Compelling reasons exist to seal this personal, non-party information to protect the privacy of the customer and his minor son and to protect them from an increased risk of identity theft and of being contacted or harassed about this litigation. This customer information has minimal relevance to the underlying cause of action, and the redactions to the document are narrowly tailored. Accordingly, the public’s interest in access to court records will not be seriously affected by this redaction.
Page ending -130 (the name following the line beginning “Kind regards”)	

23 I declare under penalty of perjury under the laws of the United States of America that the
 24 foregoing is true and correct. Executed on October 5, 2023, in New York, New York.
 25

26 /s/ Yonatan Even
 27 Yonatan Even
 28